

EPA Comments on the OU2 DQO tables and Conceptual Site Model
South Dayton Dump & Landfill

May 17, 2013

Comments on DQO tables:

1. Phasing is not explained in the text of the OU2 RI Scoping document but is the basis of the DQO tables. Provide an overview (insert a section after 3.1?) of the focus of and rationale for each phase.
2. Ohio soil leaching values should be added to Table 3.2 and the list of screening values.
3. Eco-risk screening values should be added to the list of screening values and Tables 3.4 and 3.6.
4. Human health screening values should be added to Table 3.5.
5. The way in which background samples will be statistically manipulated to derive background values is unclear.

Comments on the Conceptual Site Model Tech Memo:

6. Human health exposure pathways related to sediment should be included in the CSM. Human receptors in the GMR/floodplain exposure area and the Quarry Pond can have direct contact with sediment and surface water, and ingestion of fish.
7. Ecological receptors should be added to the CSM.
8. Consider making the Quarry Pond its own exposure area.
9. In the absence of institutional controls, someone could live on OU1 or OU2; add residents as a potential receptor.
10. In note 2, the first bullet, strike the phrase in brackets and the reference to hot spots, and add groundwater and air so that all media are listed in one place.
11. Clarify the significance of using the MCD floodplain definition over the FEMA definition.